

# **Exhibit G**

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January 3, 2012

**VIA FACSIMILE**

Honorable Andrew J. Peck  
U.S.D.C. – Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007  
Fax No. 212-805-7933

**Re: *da Silva Moore, et al. v. Publicis Groupe SA, et al.*, Civ. No. 11-CV-1279**

Dear Judge Peck,

Plaintiffs hereby submit in advance of tomorrow's discovery conference their Proposed Protocol Relating to the Production of Electronically Stored Information ("ESI"). Plaintiffs apologize for sending a fax exceeding 15 pages to the Court; Plaintiffs believe that the Court should have the benefit of receiving their ESI Protocol in advance of the conference.

Defendant MSL ("Defendant") first shared its draft ESI Protocol with Plaintiffs on December 15, 2011. Defendant's proposal did not contain much of the necessary information that should be included in an ESI protocol, including a comprehensive listing of data sources, how those sources will or will not be addressed, custodians, litigation hold information and a full explanation of the proposed search methodology. Therefore, Plaintiffs were forced to add a considerable amount of the required information.<sup>1</sup> Plaintiffs then provided their redlined edits to Defendant on December 22, 2011. Though Plaintiffs had requested Defendant's edits to their proposed ESI Protocol, Defendant responded that it was unable to provide edits and instead requested a meet and confer call. Plaintiffs obliged, and the parties, along with Plaintiffs' ESI experts, conferred on December 29, 2011. The parties requested of each other clarification of certain matters. Plaintiffs provided Defendant with the requested information on January 2, 2012, but Defendant MSL has yet to provide the requested information. The parties and both sides' ESI experts spoke again on January 3, 2012 without resolving the issues in dispute.

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<sup>1</sup> In fact, from the beginning of the parties' discussions regarding ESI, Plaintiffs have had to identify Defendant's sources of ESI and the extent to which each source may or may not contain potentially relevant information. Defendant has instead focused their entire ESI effort on email data located in its EMC SourceOne email archival system.

Though the parties attempted to resolve outstanding ESI issues, they were unable to do so. Defendant MSL has yet to provide a redline edit or comments to Plaintiffs' latest draft of the ESI Protocol, which Plaintiffs believe to be fair and reasonable. From the beginning of the ESI negotiation process, Defendant has unilaterally chosen its ESI process and search methodology without conferring with Plaintiffs. Plaintiffs have attempted to work within Defendant's proposed methodology while honoring their restrictions. Plaintiffs agreed to Defendants' use of a "confidence level" search and suggested that the confidence level be increased in order to benefit all parties and to better ensure the accuracy of search hits while working with Defendant's self-imposed cap on the cost of complying with its discovery obligations. Plaintiffs believe that Defendant's proposed use of predictive coding while arbitrarily imposing a cap runs contrary to the reasoning behind the use of predictive coding. Furthermore, Defendant chose a service provider and approach that has greatly inflated the cost of the ESI process thus far, and Defendant has unfairly attempted to hold Plaintiffs accountable for those decisions and related fees. At no time did Defendant confer with Plaintiffs before incurring exorbitant costs related to the collection and processing of ESI that was not even requested by Plaintiffs.

Plaintiffs are willing to continue to compromise regarding the parties' ESI Protocol, and eagerly hope that Defendant MSL will do the same. We look forward to resolving any outstanding ESI issues tomorrow and thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Janette Wipper

Janette Wipper

Cc: All counsel of record (via e-mail)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                     |   |   |
|-------------------------------------|---|---|
| MONIQUE DA SILVA MOORE,             | : |   |
| MARYELLEN O'DONOHUE, LAURIE         | : |   |
| MAYERS, HEATHER PIERCE, and         | : |   |
| KATHERINE WILKINSON, on behalf of   | : | Case No. 11-cv-1279 (RJS) (AJP)             |
| themselves and all others similarly | : |   |
| situated,                           | : |   |
|                                     | : |   |
| Plaintiffs,                         | : |   |
|                                     | : | <b><u>PLAINTIFFS' PROPOSED PROTOCOL</u></b> |
| vs.                                 | : | <b><u>RELATING TO THE PRODUCTION OF</u></b> |
|                                     | : | <b><u>ELECTRONIC STORED</u></b>             |
| PUBLICIS GROUPE SA and              | : | <b><u>INFORMATION ("ESI")</u></b>           |
| MSLGROUP,                           | : |   |
| Defendants.                         | : |   |

A. Scope

1. General. The procedures and protocols outlined herein govern the production of electronically stored information ("ESI") by Defendant MSL during the pendency of this litigation. The parties to this protocol will take reasonable steps to comply with this agreed-upon protocol for the production of documents and information existing in electronic format. Nothing in this protocol will be interpreted to require disclosure of documents or information protected from disclosure by the attorney-client privilege, work-product product doctrine or any other applicable privilege or immunity.

2. Limitations and No-Waiver. This protocol provides a general framework for the production of ESI on a going forward basis. The parties and their attorneys do not intend by this protocol to waive their rights to the attorney work-product privilege, except as specifically required herein, and any such waiver shall be strictly and narrowly construed and shall not extend to other matters of information not specifically described herein. All parties preserve their attorney client privileges and other privileges and there is no intent by the protocol to in any way waive or weaken these privileges. All documents produced hereunder are full protected and

covered by the parties' confidentiality and clawback agreements and orders of the Court effectuating same.

3. Relevant Time Period. January 1, 2001 through the date of judgment.

B. ESI Preservation

1. Defendant MSL has issued litigation notices to designated employees on February 10, 2010, March 14, 2011 and June 9, 2011. Defendant MSL agrees to continue to enforce the litigation hold of information located in the Sources outlined below under section C.

C. Sources

1. The parties have identified the following sources of potentially discoverable ESI at Defendant MSL. Phase I sources will be addressed first, and Phase II sources will be addressed after Phase I source searches are complete. In addition, social media sources used by MSL employees and other sources containing employee and HR complaints yet to be identified by MSL shall be Phase I sources.

|   | <b>Data Source</b>    | <b>Description</b>  | <b>Phase</b> |
|---|-----------------------|---|--------------|
| a | EMC SourceOne Archive | Archiving System used to capture and store all incoming and outbound e-mails and selected instant message conversations saved through IBM Sametime (see below). | I            |
| b | Lotus Notes E-mail    | Active corporate system that provides e-mail communication and calendaring functions.   | N/A          |
| c | GroupWise E-mail      | Legacy corporate system that provided e-mail communication and calendaring functions.   | N/A          |
| d | IBM Sametime          | Lotus Notes Instant Messaging and collaboration application.  | N/A          |
| e | Home Directories      | Personal network storage locations on the file server(s) dedicated to individual users.   | I            |
| f | Shared Folders        | Shared network storage locations on the file server(s) that are accessible by individual users, groups of users or entire departments.                          | I            |
| g | Database Servers      | Backend databases (e.g. Oracle, SQL, MySQL) used to store information for front end applications or other purposes.   | II           |
| h | Halogen Software      | Performance management program provided by  | I            |

|    |                                       |   |     |
|----|---------------------------------------|---|-----|
|    |                                       | Halogen to conduct performance evaluations.   |     |
| i  | Noovoo                                | Corporate Intranet site based on Atlassian's content and social collaboration product, Confluence.                  | I   |
| j  | Corporate Feedback                    | E-mail addresses that employees may utilize to provide the company with comments, suggestions and overall feedback. | I   |
| k  | Hyperion Financial Management ("HFM") | Oracle application that offers global financial consolidation, reporting and analysis.                              | I   |
| l  | Vurv/ Taleo                           | Talent recruitment software.  | I   |
| m  | ServiceNow                            | Help Desk application used to track employee computer related requests.   | II  |
| n  | PeopleSoft                            | Human resources information management system.  | I   |
| o  | PRISM                                 | PeopleSoft component used for Time and billing management.  | I   |
| p  | Portal                                | A project based portal provided through Oracle/BEA Systems.   | II  |
| q  | Desktops/Laptops                      | Fixed and portable computers provided to employees to perform work related activities.                              | I   |
| r  | Publicis Benefits Connection          | Web based site that maintains information about employee benefits and related information.                          | II  |
| s  | GEARS                                 | Employee expense reporting system.  | II  |
| t  | MS&L City                             | Former corporate Intranet.  | I   |
| u  | Adium                                 | Instant Messaging application.  | N/A |
| v  | Pidgin                                | Instant Messaging application.  | N/A |
| w  | IBM Lotus Traveler and MobileIron     | Mobile device synchronization and security system.  | N/A |
| x  | Webmail                               | Web-based email application.  | N/A |
| y  | Mobile Communication Devices          | Portable PDAs, smart phones, tables used for communication.   | N/A |
| z  | Yammer                                | Social media and collaboration portal.  | N/A |
| aa | SalesForce.com                        | Web-based customer relationship management application.   | N/A |
| bb | Removable Storage Devices             | Portable storage media, external hard drives, thumb drives, etc. used to store copies of work related ESI.          | N/A |

a. EMC SourceOne - Defendant MSL uses SourceOne, an EMC e-mail archiving system that captures and stores all e-mail messages that pass through the corporate e-mail system. In addition, if a user chooses to save an instant messaging chat conversation from IBM Sametime (referenced below), that too would be archived in SourceOne. Defendant MSL

also acknowledged that all Calendar information is part of the e-mail content that is archived to the SourceOne system. The system was installed on [Date] and has a seven (7) year retention period for data that is archived after which it is purged. Defendant MSL will suspend all automated data destruction policies for the duration of this litigation. The parties have agreed that this data source will be handled as outlined in section E below.

b. Lotus Notes E-mail - Defendant MSL currently maintains multiple Lotus Notes Domino servers in various data centers around the world. All e-mail communication and calendar items are Journalized in real time to the EMC SourceOne archive. Defendant MSL migrated to the Lotus Notes environment from the former GroupWise e-mail system (referenced below) from [Date] to [Date] with a clean cutover on [Date]. The parties have agreed to not collect any information from this data source at this time.

c. GroupWise E-mail – Prior to the implementation of the Lotus Notes environment, GroupWise was used for all e-mail and calendar functionality. Before the decommissioning of the GroupWise servers, Defendant MSL created backup tapes of all servers that housed the GroupWise e-mail databases. The parties have agreed to not collect any information from this data source at this time and that Defendant MSL will continue to preserve the backup tapes for the duration of this litigation.

d. IBM Sametime – Defendant MSL provides custodians with the ability to have real time chat conversations via the IBM Sametime application that is part of the Lotus Notes suite of products. While chat conversations are not retained automatically, custodians may choose to save them on an ad hoc basis which would then be retained within the EMC SourceOne archive.

e. Home Directories – Custodians with corporate network access at Defendant MSL also have a dedicated and secured network storage location where they are able

to save files. Defendant MSL suggests that the content stored within this data source is wholly duplicative of what is maintained in the EMC SourceOne archive. Defendant MSL has also indicated that during the e-mail migration from GroupWise to Lotus Notes, employees were provided with cached copies of their GroupWise e-mail accounts to assist in the transition. The parties have agreed to select 7 custodians whose home directory data, including any GroupWise e-mail archives located therein, will be collected and analyzed to determine the level of duplication of documents in this data source against the data contained in the EMC SourceOne archive for the same custodians. The results of the analysis will be provided to Plaintiffs so that a determination can be made by the parties as to whether Defendant MSL will include this data source in its production of ESI to Plaintiffs. If so, the parties will attempt to reach an agreement as to the approach used to collect, review and produce responsive and non-privileged documents.

f. Shared Folders – Individual employees, groups of employees and entire departments at MSL are given access to shared network storage locations to save and share files. Defendant MSL has agreed to create and share with Plaintiffs a directory listing of all shared folders contained within the File Servers. Plaintiffs will then review and designate those folders that will be collected, reviewed and produced. In addition, the parties have agreed that Defendant MSL will review and produce all responsive and non-privileged ESI maintained within the “North America HR Drive”, a common storage location for personnel forms and related documents.

g. Database Servers – Defendant MSL has indicated that it does not utilize any database servers. Plaintiffs request clarification on this position given that Defendant MSL has provided details for applications that use Oracle as a database for information warehousing. Plaintiffs would like a confirmation that Defendant MSL does not maintain any databases,



beyond those used by the front-end applications referenced in the Sources section above, which contain potentially relevant information.

h. Halogen Software – Defendant MSL utilizes a third party product, Halogen, for performance management and employee evaluations. Plaintiffs request additional clarification about the specific type of data maintained within this system. The parties will meet and confer in order to exchange additional information and attempt to reach an agreement as to the scope of data and the approach used to collect, review and produce responsive and non-privileged documents..

i. Noovoo – Defendant MSL maintains a corporate Intranet site called “Noovoo” that was developed using Atlassian’s content and social collaboration product, Confluence, where employees are able to access company related information, offer anonymous suggestions and download corporate documents. The parties have agreed that all responsive and non-privileged ESI will be produced.

j. Corporate Feedback – Defendant MSL has maintained various e-mail addresses that employees may utilize to provide the company with comments, suggestions and overall feedback. These e-mail addresses include “powerofone@mslworldwide.com”, “poweroftheindividual@mslworldwide.com”, “townhall@mslworldwide.com” and “whatsonyourmind@mslworldwide.com”. The parties have agreed that all responsive and non-privileged ESI will be produced from these e-mail accounts and any other e-mail accounts that fall under this category of information.

k. Hyperion Financial Management (“HFM”) – Defendant MSL uses an Oracle application called HFM that offers global financial consolidation, reporting and analysis capabilities. Plaintiffs request clarification with respect to the Bonus Pool program and related

calculations that may or may not be maintained within the HFM system. The parties have agreed that all responsive and non-privileged ESI will be produced.

l. Vurv/ Taleo - Since approximately 2006, Defendant MSL used an application known as Vurv as its talent recruitment software. As of August 31, 2011, as a result of Vurv being purchased by Taleo, Defendant MSL has been using a similar application by Taleo as its talent recruitment software. The application, which is accessed through Defendant MSL's public website, allows users to search for open positions as well as input information about themselves. Plaintiffs request additional clarification about the specific type of data maintained within this system and other seemingly related sources (e.g. <http://karma.recruitmax.com>). The parties will meet and confer in order to exchange additional information and attempt to reach an agreement as to what, if any, data will be collected and the approach used to review and produce responsive and non-privileged documents.

m. ServiceNow - Defendant MSL utilizes ServiceNow as its Help Desk application. This system covers a wide variety of requests by employees computer-related assistance (e.g., troubleshoot incidents, install software, etc.). Logs generally are maintained for seven years. Defendant MSL will suspend all automated data destruction policies for the duration of this litigation. The parties have agreed that Defendant MSL will generate and produce an export from ServiceNow of all non-privileged records relating to all requested custodians.

n. PeopleSoft - MSL utilizes PeopleSoft, an Oracle-based software product, to record employee data such as date of hire, date of termination, promotions, salary increases, transfers, etc. Such information is retained indefinitely. Plaintiffs understand that the payroll processing function is a component of PeopleSoft and is referred to as "HRAS". The parties

have agreed that all responsive and non-privileged ESI, including payroll information, relating to all class members and comparators will be produced from this system.

o. PRISM - Defendant MSL utilizes PRISM for tracking time and billing. It is used primarily to track an employee's billable time. PRISM is a component of the PeopleSoft system. PRISM data is stored in the North America Data Center located in Virginia and is retained indefinitely. The parties have agreed that all responsive and non-privileged ESI relating to all class members and comparators will be produced from this system.

p. Portal - Defendant MSL maintains a portal provided through Oracle/BEA Systems. The portal is web-based and is used for light workflow activities (such as reviewing draft documents). Use of the portal is project-based and used only for a single client. Plaintiffs request additional clarification about the specific type of data maintained within this system. The parties will meet and confer in order to exchange additional information and attempt to reach an agreement as to what, if any, data will be collected and the approach used to review and produce responsive and non-privileged documents.

q. Desktops/Laptops - Defendant MSL provided employees with desktop and/or laptop computers to assist in work related activities. Defendant MSL does not have a synchronization function that would transfer ESI from the local computer's hard drive to the network storage locations. Plaintiffs understand the custodians may or may not manually transfer ESI to the network storage. Defendant MSL has indicated that during the e-mail migration from GroupWise to Lotus Notes, employees were provided with cached copies of their GroupWise e-mail accounts to assist in the transition. The parties have agreed to select 7 custodians whose local desktop and/or laptop data, including GroupWise e-mail archives that would contain communications not transferred to the EMC SourceOne archive, will be collected and analyzed for duplication against the data contained in the EMC SourceOne archive for the

same custodians. The results of the analysis will be provided to Plaintiffs so that a determination can be made by the parties as to whether Defendant MSL will include this data source in its production of ESI to Plaintiffs. If so, the parties will attempt to reach an agreement as to the approach used to collect, review and produce responsive and non-privileged documents..

r. Publicis Benefits Connection – Plaintiffs understand that Defendant MSL provides employees with access to a centralized web based site that provides access to corporate benefits information and other related content. The parties have agreed that all responsive and non-privileged ESI relating to corporate specific documents will be produced from this system.

s. GEARS – Defendant MSL maintains a centralized web-based expense tracking and reporting system called “GEARS” where users are able to enter expenses and generate reports. Plaintiffs request additional clarification about the specific type of data maintained within this system. The parties will meet and confer in order to exchange additional information and attempt to reach an agreement as to what, if any, data will be collected and the approach used to review and produce responsive and non-privileged documents.

t. MS&L City – Defendant MSL maintained a corporate web-based Intranet prior to migrating to Noovoo that contained performance management, promotion recommendation and other related forms and documents. The parties have agreed that all responsive and non-privileged ESI will be produced from this system.

u. Adium – Defendant MSL offers a free and open source instant messaging client for Mac OS X users. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

v. Pidgin – Defendant MSL provides employees with a “social media” or instant messaging system, whose data resides with a third party messaging provider (e.g. AIM,

Yahoo!, Google Talk, MSN Messenger, etc.) Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

w. IBM Lotus Traveler and MobileIron – Defendant MSL maintains these systems for e-mail device sync and security features for employees' mobile devices, including Blackberry devices, iPhones, iPads, Android phones, and Android tablets. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

x. Webmail – Defendant MSL allows employees to access email remotely and on the Internet. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

y. Mobile Communication Devices - Defendant MSL provides mobile devices and/or connectivity including Blackberry devices, iPhones, iPads, Android phones, and Android tablets to all employees at the VP level and above. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

z. Yammer – Defendant MSL provided employees with an instant messaging application hosted externally, used for approximately one year in or around 2008 through 2009. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

aa. SalesForce.com – Defendant MSL provided access to a web-based customer relationship management application but it was not widely used. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

bb. Removable Storage Devices – Defendant MSL does not restrict employees from using removable storage devices. Defendant MSL confirms that there is no potentially discoverable ESI within this its custody or control relating to this data source.

#### D. Custodians

1. The Parties agree that Defendant MSL will review and produce all relevant ESI stored in sources identified under section C.1 (except for sources listed under section C.1.a, e, m & q). The Parties agree that the production of ESI from the data sources identified under section C.1.a, e, m, & q will be limited to the following individuals:

|     | Custodian Name                     | Title  |
|-----|------------------------------------|--|
| 1.  | Lund, Wendy                        | Executive VP of Global Client and Business Development |
| 2.  | Fite, Vicki                        | Managing Director, MSL Los Angeles                     |
| 3.  | Wilson, Renee                      | President, NE Region, Managing Director NY             |
| 4.  | Brennan, Nancy                     | SVP/Director Corporate Branding                        |
| 5.  | Lilien (Lillien , Kashanian), Tara | SVP, North America Human Resources                     |
| 6.  | Dencker, Kelly                     | Senior VP, Practice Director, NY Healthcare            |
| 7.  | Miller, Peter                      | Executive Vice President, CFO                          |
| 8.  | Masini, Rita                       | Chief Talent Officer                                   |
| 9.  | Tsokanos, Jim                      | President of the Americas                              |
| 10. | Dasilva, Monique                   | Director Healthcare Practice, Global                   |
| 11. | O’Kane, Jeanine                    | Director of Healthcare North America                   |
| 12. | Perlman, Carol                     | Senior VP  |
| 13. | Mayers, Laurie                     | SVP MS&L Digital                                       |
| 14. | Wilkinson, Kate                    | Account Executive                                      |
| 15. | Curran, Joel                       | Managing Director MSL Chicago                          |
| 16. | Shapiro, Maury                     | North American CFO                                     |
| 17. | Baskin, Rob                        | Managing Director                                      |
| 18. | Pierce, Heather                    | VP   |
| 19. | Branam, Jud                        | Managing Director, MS&L Digital                        |
| 20. | McDonough, Jenni                   | VP, Director of Human Resources                        |
| 21. | Hannaford, Donald                  | Managing Director                                      |
| 22. | Orr, Bill                          | Managing Director                                      |
| 23. | Dhillon, Neil                      | Managing Director MSL Washington DC                    |
| 24. | Hubbard, Zaneta                    | Account Supervisor                                     |
| 25. | Morgan, Valerie                    | HR Director  |
| 26. | Daversa, Kristin                   | HR Director  |

|     |                     |  |
|-----|---------------------|--|
| 27. | Vosk, Lindsey       | HR Manager   |
| 28. | Carberry, Joe       | President, Western Region  |
| 29. | Sheffield, Julie    | HR/Recruiting Associate  |
| 30. | Beaudoin, Scott     | SVP of Global Consumer Marketing, NA Director of Cause Marketing and CSR |
| 31. | Binkowski, David    | Web Project Manager, SVP   |
| 32. | Bryant, Steve       | Managing Director, Seattle   |
| 33. | Chamberlin, David   | SVP and Director of Issues and Crisis Management                         |
| 34. | Farnham, Kyle       | Managing Director, Atlanta   |
| 35. | Fleurot, Olivier    | CEO, MSLGroup  |
| 36. | Gross, Meghan       | Managing Director, MSL Boston  |
| 37. | Hass, Mark          | (former) CEO   |
| 38. | Harris, Peter       | NA Director of Corporate   |
| 39. | Hughes, Keith       | NA Director of Consumer Operations                                       |
| 40. | Kolhagen, Kelly     | Managing Director, MSL Detroit   |
| 41. | Lee, Don            | Managing Director, PBJs Chicago  |
| 42. | Morsman, Michael    | (former) MD of Ann Arbor   |
| 43. | Charles Winner      | Founder, Winner & Associates   |
| 44. | Zachary Winner      | CEO, Winner & Associates   |
| 45. | Justyn Winner       | Executive VP & General Counsel, Winner & Associates                      |
| 46. | Matthew Gardner     | Managing Director, MSL San Francisco                                     |
| 47. | MaryEllen O'Donohue | SVP  |

#### E. Search Methodology

1. General. The Parties have discussed the methodologies or protocols for the search and review of ESI collected from the EMC SourceOne archive and the following is a summary of the Parties' agreement on the use of Predictive Coding. This section relates solely to the EMC SourceOne data source.

2. General Overview of Predictive Coding Process. Defendant MSL will utilize the Axcelerate software by Recommind to search and review the EMC SourceOne ESI for production in this case.

The process begins with Jackson Lewis attorneys developing an understanding of the entire EMC SourceOne corpus while identifying a small number of documents, the initial seed set, that is representative of the categories to be reviewed and coded (relevance, privilege, issue-



relation). It is the step when the first seed sets are generated which is done by use of search and analytical tools, including keyword, Boolean and concept search, concept grouping, and more than 40 other automatically populated filters available within the Axcelerate system. This assists in the attorneys' identification of probative documents for each category to be reviewed and coded. The seed sets are then used to begin the Predictive Coding process. Each seed set of documents is applied to its relevant category and starts the software "training" process. The software uses each seed set to identify and prioritize all substantively similar documents over the complete corpus of the EMC SourceOne archive. The attorneys then review and code all "computer suggested" documents to ensure their proper categorization and to further calibrate the system by recoding documents into their proper categories. Axcelerate learns from the new corrected coding and the Predictive Coding process is repeated.

Attorneys representing Defendant MSL will have access to the all of the EMC SourceOne ESI to be searched and will lead the computer training, but they will obtain input and approval from Plaintiffs' counsel during the iterative seed selection and quality control processes and will share the information used to craft the search protocol as further described herein. Documents within each seed set determined to be relevant and not privileged after a double-pass review by Defendant MSL will be produced to Plaintiffs' counsel during the iterative seed set selection process. This is expected to involve multiple small set productions. Plaintiffs' counsel will review the documents produced and promptly provide defense counsel with its own evaluation of the initial coding applied to the documents, including identification of any documents it deems irrelevant.

Plaintiffs' counsel also will be provided with preliminary results of hit counts using keyword searches to create a high priority relevant seed set, and will be invited to contribute keyword and other search criteria suggestions for testing as the seed sets are developed. Again,



the keyword testing and sample review will result in iterative small set productions to Plaintiffs' counsel of documents categorized as relevant and non-privileged. Plaintiffs' counsel shall again provide prompt feedback in writing as to the documents produced in this stage. In addition, when the seed sets have been fully developed and run through the entire universe of documents, a random sample of the documents categorized as irrelevant and non-privileged by the seed sets shall be produced to Plaintiffs' counsel so they can approve or modify the categorization of the quality control findings. The irrelevant documents so produced shall be promptly returned after review and analysis by Plaintiffs' counsel.

The accuracy of the search processes, both the systems' functions and the attorney judgments to train the computer, will be tested and quality controlled by both judgmental and statistical sampling. In statistical sampling, a small set of documents is randomly selected from the total corpus of the documents to be tested. The small set is then reviewed and an error rate calculated therefrom. The error rates can then be reliably projected on the total corpus, having a margin or error directly related to the sample size.

Once trained, the predictive coding tools in Axcelerate will suggest coding categorizations for the remaining documents in the total collection. The documents deemed to be irrelevant will be sampled to verify that they are unlikely to contain relevant documents. Plaintiffs will be provided with a copy of the non-privileged documents from the sample so they can approve the quality control findings. Plaintiffs' counsel shall promptly report any disagreements on classification, and the parties shall discuss these issues in good faith, so that the seed set training may be improved accordingly. The irrelevant, non-privileged documents so produced shall be promptly returned after review and analysis by Plaintiffs' counsel. The relevant, non-privileged documents will be produced to Plaintiffs as outlined below in section G.

3. Issue Tags. The parties agree that, to the extent applicable, as part of the seed set training described above, all documents categorized as relevant and not privileged, to the extent applicable, also shall be coded by Jackson Lewis attorneys with one or more of the following agreed-upon issue tags:

a. **Reorganization:** Documents relating to the formation of MSLGroup; the reorganization, restructure, realignment or formation of the North American Leadership Team or the leadership or management team under President Jim Tsokonon; the centralization of all MSL offices and specialized units under MSLGroup; the restructure, realignment, formation or elimination of MSL's regional or local offices, practice groups, projects, teams or staff under President Jim Tsokonon; budgets and financial estimates relating to the reorganization and/or restructuring of MSLGroup; and all other documents related to reorganization and/or restructuring of MSLGroup.

b. **Promotion/Assignments:** Documents concerning decisions to request, recommend, grant or deny employees promotions or demotions, applications for promotions, recruitment or choosing of employees for promotions or demotions, job assignments, the promotion freeze, and complaints about promotions, demotions and job assignments.

c. **Work/Life Balance:** Documents relating to workplace flexibility, alternate work arrangements, flexible or reduced schedules, part-time schedules, freelance, consultants, hours spent on or at work-related activities, and complaints regarding work/life balance or work schedules.

d. **Termination:** Documents relating to termination, severance or resignation of employees, the hiring freeze, and complaints regarding terminations.

e. **Compensation:** Documents relating to salaries, raises, pay cuts, bonuses, commission, benefits, the salary/raise freeze, any other type of compensation to employees, and complaints regarding compensation.

f. **Maternity/Pregnancy:** Documents relating to pregnancy of employees, working mothers, and maternity, paternity, any other pregnancy related leave of employees, and complaints regarding pregnancy, maternity, parental leave.

g. **Complaints/HR:** Documents relating to complaints by employees regarding discrimination, harassment, pregnancy, work-life balance, compensation, promotion, demotion, termination, assignments, discipline, inappropriate comments or actions by management, the freeze or the reorganization/restructuring of MSLGroup to anyone at MSL, including but not limited to Human Resources.

h. **Publicis Groupe/Jurisdiction:** Documents relating to the relationship between MSL and Publicis Groupe.

i. **Privilege:** Documents privileged based on the attorney-client or work product doctrines.

This issue coding will take place during the initial random sample, creation of the seed set and initial and iterative training (see paragraphs 4, 5 and 6 below). This input, with the exception of Privilege tags, shall be provided to Plaintiffs' counsel along with the initial document productions. Plaintiffs' counsel shall promptly report any disagreements on classification, and the parties shall discuss these issues in good faith, so that the seed set training may be improved accordingly. This issue-tagging and disclosure shall take place during the described collaborative seed set training process only and shall not be required in subsequent productions.

4. Initial Random Sample. Using the Axcelerate software to generate a random sample of the entire corpus of documents uploaded to the Axcelerate search and review platform, Defendant MSL's attorneys will conduct a review of the random sample for relevance and to develop a baseline for calculating recall and precision. To the extent applicable, any relevant documents also will be coded with one or more of the issue tags referenced in paragraph E.3 above. The random sample consists of 16,555 documents, which represents a 99% confidence level with a confidence estimation of plus or minus 1%.<sup>1</sup>

5. Seed Set.

a. Defendant MSL. To create the initial seed set of documents that will be used to "train" the Axcelerate software as described generally above, Defendant MSL primarily utilized keywords listed on Exhibits A, B and C to this protocol, but also utilized other judgmental analysis and search techniques designed to locate highly relevant documents, including the Boolean, concept search and other features of Axcelerate. Given the volume of hits for each keyword (Exhibit A), Defendant MSL reviewed a sampling of the hits and coded them for relevance as well as for the following six preliminary issues: (i) Reorganization; (ii) Promotion; (iii) Work/Life Balance; (iv) Termination; (v) Compensation; and (vi) Maternity. Specifically, except for key words that were proper names, Defendant MSL performed several searches within each set of key word hits and reviewed a sample of the hits. The Axcelerate software ranked the hits in order of relevance based on the software's analytical capabilities and the documents were reviewed in decreasing order of relevance (i.e., each review of the sample of supplemental searches started with the highest ranked documents). Exhibit B identifies the supplemental searches conducted, the number of hits, the number of documents reviewed, the

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<sup>1</sup> At the time the random sample was generated, the Axcelerate database contained 2,980,104 documents. However, it did not include the e-mail accounts of: (i) Valerie Morgan, (ii) Kristin Daversa; (iii) Lindsay Vosk; (iv) Julie Sheffield; and (v) Joe Carberry. These accounts were still in the process of being loaded when the random sample was generated. [MSL to update figures.]

number of documents coded as potentially responsive and general comments regarding the results.<sup>2</sup> In addition, to the extent applicable, documents coded as responsive also were coded with one or more issue tags. Defendant MSL will repeat the process outlined above for the newly defined issues. Defendant MSL will provide Plaintiffs with all of the non-privileged documents and will provide, to the extent applicable, the issue tag(s) coded for each document, as described above. Plaintiffs shall promptly review and provide notice as to any documents where they disagree with or do not understand the coding. If necessary, counsel will meet and confer to attempt to resolve any disagreements regarding the coding applied to the documents in this seed set.

b. Plaintiffs. To help create the initial seed set of documents that will be used to “train” the Axcelerate software, Plaintiffs provided a list of potential key words to Defendant MSL. Defendant MSL provided Plaintiffs with a hit list for their proposed key words and Plaintiffs hereby provide a revised list of potential key words. (See Exhibit C.) Defendant MSL will provide Plaintiffs with an updated hit list using the key words provided in Exhibit C. Defendant MSL will review 5,000 randomly sampled documents from Plaintiffs’ supplemental list of key words to be coded for relevance and issues. Defendant MSL will provide Plaintiffs with all non-privileged documents and will provide, to the extent applicable, the issue tag(s) coded for each document. Plaintiffs shall promptly review and provide notice as to any documents where they disagree with or do not understand the coding. If necessary, the parties’ counsel will meet and confer to attempt to resolve any disagreements regarding the coding applied to the documents in this seed set.

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<sup>2</sup> The documents were coded as “potentially responsive” because the initial review was conducted by reviewers who were instructed to interpret responsiveness broadly and, at the time this disclosure was made to Plaintiffs’ counsel, a second level review had not been conducted.

c. Judgmental Sampling. In addition to the above, a number of targeted searches were conducted by Defendant MSL in an effort to locate documents responsive to several of Plaintiffs' specific discovery requests. Approximately 1,000 pages of documents have already been coded as responsive and produced to Plaintiffs. In addition, several judgmental searches were conducted which resulted in approximately 300 documents initially being coded as responsive and several thousand additional documents coded as irrelevant. The documents coded as relevant and non-privileged also will be reviewed by Plaintiffs and, subject to their feedback, included in the seed set. An explanation shall be provided by MSL's attorneys for the basis of the bulk tagging of irrelevant documents (primarily electronic periodicals and newsletters that were excluded in the same manner as spam junk mail is excluded). The explanation shall include the types of documents bulk tagged as irrelevant as well as the process used to identify those types of documents and other similar documents that were bulk tagged as irrelevant.

6. Initial And Iterative Training. Following the creation of the first seed set, the Axcelerate software will review the entire data set to identify other potentially relevant documents. Defendant MSL will then review a random sample of 16,555 documents (generated by the Axcelerate software) to be coded for relevance and any applicable issue tags. (This 16,555 number is based on a 99% confidence level with a confidence estimation of plus or minus 1%.) The results of this review, both the documents coded as relevant and not relevant, will be provided to Plaintiffs' counsel for review and comment as described above. Further, all documents produced by the parties herein to each other, including, without limitation, these small seed set development productions, shall be made under the Confidentiality Stipulation in this matter as well as any clawback agreement that shall be reduced to an order acceptable to the Court. Following the initial review and any related meet and confer sessions, the Axcelerate

software will conduct a second review of the entire data set to identify potentially relevant documents and, thereafter, Defendant MSL will review a random sample of 16,555 documents to be coded for relevance and any applicable issue tags. The results of this review, both the documents coded as relevant and not relevant, will be provided to Plaintiffs' counsel for review and comment. (Again, any documents coded as "not relevant" will be provided subject to the Confidentiality Stipulation and any clawback agreement.) Any documents marked as irrelevant shall be returned to counsel for Defendant MSL at the conclusion of the iterative training phase, unless the relevancy of any documents are disputed, in which case they may be submitted to the Court for review.

7. Final Search and Production. Based on the seed set, as well as the initial and iterative reviews, the Axcelerate software will again review the entire data set to identify other potentially relevant and non-privileged documents. Of the results, all relevant and non-privileged documents will be produced to Plaintiffs.

8. Quality Control by Random Sample of Irrelevant Documents. In addition, at the conclusion of this search protocol development process described above, and before the final search and production described in Paragraph 7 above, Defendant MSL will review a random sample of 16,555 documents contained in the remainder of the database that were excluded as irrelevant. The results of this review, both the documents coded as relevant and not relevant, but not privileged, will be provided to Plaintiffs' counsel for review. (Any documents initially coded as "not relevant" will be provided subject to the Confidentiality Stipulation and any clawback agreements entered in this matter will be returned to counsel for Defendant MSL within 60 days of their production.) The purpose for this review is to allow calculation of the approximate degree of recall and precision of the search and review process used. If Plaintiffs object to the proposed review based on the random sample quality control results, or any other valid



objection, they shall provide MSL with written notice thereof within fourteen days of the receipt of the random sample. The parties shall then meet and confer in good faith to resolve any difficulties, and failing that shall apply to the Court for relief. Defendant MSL shall not be required to proceed with the final search and review described in Paragraph 7 above unless and until objections raised by Plaintiffs have been adjudicated by the Court or resolved by written agreement of the parties.

F. Costs

1. Defendant MSL proposes to limit the review of the EMC SourceOne data resulting from the search methodology indicated above under section E. to 40,000 documents based on the costs incurred to date and the estimated future costs associated with the production of document from the EMC SourceOne archive.

2. Plaintiffs agree to bear all of the costs associated with its compliance with the terms of this protocol and with the receipt and review of ESI produced hereunder including the costs associated with its ESI experts at DOAR Litigation Consulting who will be involved with Plaintiffs in all aspects of this ESI protocol. Plaintiffs propose that Defendant MSL bear all of the costs associated with its obligations under the terms of this protocol and do not agree to limit the amount of information subject to the review and production of ESI by Defendant MSL.<sup>3</sup>

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<sup>3</sup> Plaintiffs take issue with Defendant MSL's proposal to limit the number of the EMC SourceOne documents subject to its review and production as a matter of principle. Furthermore, Plaintiffs will not agree to be adversely affected by Defendant MSL's unilateral decisions regarding the custodians selected, approach taken, the vendors selected and the search protocol and related costs associated with those decisions.

Plaintiffs are confident that the costs MSL claims it has incurred, "\$253,549 in vendor costs for the copying and exemplification of e-mail onto the Axcelerate search and review platform" and the hosting fees of \$17,000 per month are well in excess of what they should have been and what they would have been if Defendant MSL had sought Plaintiffs' involvement in the factors that lead to those costs. **Plaintiffs also strongly disagree with the estimated cost of \$5.00 per document set forth by Defendant MSL to conduct its review of documents and question, given the exorbitant costs of the entire process, why the proposed search methodology is being put forward as predictive coding which, at its core, is a cost-saving mechanism.**



G. Format of Production

1. TIFF/Native File Format Production. Documents will be produced as single-page TIFF images with corresponding multi-page text and necessary load files. The load files will include an image load file as well as a metadata (.DAT) file with the metadata fields identified on Exhibit D. Defendant MSL will produce spreadsheets (.xls files) and PowerPoint presentations (.ppt files) in native form as well as any documents that cannot be converted to TIFF format (e.g., audio or video files, such as mp3s, wavs, megs, etc.). In addition, for any redacted documents that are produced, the documents' metadata fields will be redacted where required. For the production of ESI from the sources listed at C.1.g through C.1.p and C.1.r through C.1.t, the parties will meet and confer to attempt to reach an agreement of the format of production.

2. Appearance. Subject to appropriate redaction, each document's electronic image will convey the same information and image as the original document. Documents that present imaging or formatting problems will be promptly identified and the parties will meet and confer in an attempt to resolve the problems.

3. Document Numbering. Each page of a produced document will have a legible, unique page identifier "Bates Number" electronically "burned" onto the image at a location that does not obliterate, conceal or interfere with any information from the source document. The Bates Number for each page of each document will be created so as to identify the producing party and the document number. In the case of materials redacted in accordance with applicable law or confidential materials contemplated in any Confidentiality Stipulation entered into by the

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Ralph Losey, National E-Discovery Counsel and a partner at Defendant MSL's law firm, Recommind, and Judge Peck all acknowledge that the reduction of cost is a key factor in the use of predictive coding over traditional manual review.

parties, a designation may be “burned” onto the document’s image at a location that does not obliterate or obscure any information from the source document.

4. Production Media. The producing party will produce documents on readily accessible, computer or electronic media as the parties may hereafter agree upon, including CD-ROM, DVD, external hard drive (with standard PC compatible interface), (the “Production Media”). Each piece of Production Media will be assigned a production number or other unique identifying label corresponding to the date of the production of documents on the Production Media (e.g., “Defendant MSL Production April 1, 2012”) as well as the sequence of the material in that production (e.g. “-001”, “-002”). For example, if the production comprises document images on three DVDs, the producing party may label each DVD in the following manner “Defendant MSL Production April 1, 2012”, “Defendant MSL Production April 1, 2012-002”, “Defendant MSL Production April 1, 2012-003.” Additional information that will be identified on the physical Production Media includes: (1) text referencing that it was produced in *da Silva Moore v. Publicis Groupe SA, et al.*; and (2) the Bates Number range of the materials contained on the Production Media. Further, any replacement Production Media will cross-reference the original Production Media and clearly identify that it is a replacement and cross-reference the Bates Number range that is being replaced.

5. Write Protection and Preservation. All computer media that is capable of write-protection should be write-protected before production.

6. Inadvertent Disclosures. The terms of the parties’ Clawback Agreement and Court Order shall apply to this protocol.

7. Duplicate Production Not Required. A party producing data in electronic form need not produce the same document in paper format.

**E. Timing.**

1. To the extent a timeframe is not specifically outlined herein, the parties will use their reasonable efforts to produce ESI in a timely manner consistent with the Court's discovery schedule.

2. The parties will produce ESI on a rolling basis.

**F. General Provisions.**

1. Any practice or procedure set forth herein may be varied by agreement of the parties, and first will be confirmed in writing, where such variance is deemed appropriate to facilitate the timely and economical exchange of electronic data.

2. Should any party subsequently determine it cannot in good faith proceed as required by this protocol, the parties will meet and confer to resolve any dispute before seeking Court intervention.

3. This protocol may be executed in counterparts. Each counterpart, when so executed, will be deemed an original, and will constitute the same instrument.

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Melville, NY 11747  
Telephone: (631) 247-0404

Date: \_\_\_\_\_, 2011

Date: \_\_\_\_\_, 2011

**EXHIBIT A**

| Search Term                              | Hits    |
|--|---------|
| "Anita"                                  | 70,376  |
| "Binkowski"                              | 43,890  |
| "Bonus"                                  | 40,756  |
| "Branam"                                 | 66,959  |
| "Centralized Management Team"            | 3       |
| "Compensation"                           | 55,602  |
| "Complaint "                             | 8,672   |
| "da Silva" OR "daSilva"                  | 201,179 |
| "Discrimination"                         | 7,211   |
| "Diversity "                             | 38,315  |
| "Ellena"                                 | 6,853   |
| "Exception"                              | 17,354  |
| "Fite"                                   | 290,518 |
| "Friedman"                               | 34,304  |
| "Healthcare"                             | 242,054 |
| "Heather" /2 "Pierce"                    | 36,317  |
| "Hiring Freeze"                          | 694     |
| "Jud"                                    | 70,352  |
| "Kate" /2 "Wilkinson"                    | 93,107  |
| "Kelly" /2 "Denker"                      | 328     |
| "Krista"                                 | 38,346  |
| "Laurie" /2 "Mayers"                     | 137,706 |
| "Lilien"                                 | 299,955 |
| "Lund"                                   | 353,246 |
| "Manning"                                | 170,064 |
| "Mark" /2 "Hass"                         | 26,195  |
| "MaryEllen" OR "Mary Ellen"              | 160,491 |
| "Masini"                                 | 242,991 |
| "Maternity Leave"                        | 13,210  |
| "Mission Critical"                       | 4,399   |
| "Monique"                                | 210,734 |
| "North American Leadership"              | 520     |
| "Organization Chart" OR "Org Chart"      | 6,618   |
| "O'Donohue" OR "Odonohue" OR "O Donohue" | 156,070 |
| "Performance Evaluation"                 | 2,140   |
| "PMP"                                    | 4,987   |
| "Pregnancy"                              | 10,659  |

|   |         |
|---|---------|
| "Promotion"   | 73,925  |
| "Raise"   | 60,272  |
| "Regional Leadership Team"  | 71      |
| "Relocation"  | 9,113   |
| "Reorganization"  | 5,816   |
| "Rita"  | 252,314 |
| "Salary Freeze"   | 895     |
| "Tara"  | 360,352 |
| "Termination"   | 18,204  |
| "Training"  | 165,208 |
| "Transfer"  | 39,252  |
| "Vickie"  | 292,868 |
| "Webster"   | 59,925  |
| "Wendy "  | 380,940 |
| "Work/Life Balance" OR "Work-Life Balance" OR "Work Life Balance" | 2,671   |
| (Bill OR Will OR William) /2 "Orr"                                | 36,108  |
| (Dave OR David) /2 "Chamberlain"                                  | 846     |
| (Dave OR David) /2 Binkowski                                      | 42,978  |
| (Don OR Donald) /2 "Hannaford"                                    | 20,046  |
| (Ed OR Edward OR Eduard) /2 Cafasso                               | 40,023  |
| (Jim OR James) /2 "Tsokanos"                                      | 247,162 |
| (Joe OR Joseph) /2 "Carberry"                                     | 28,510  |
| (Mike OR Michael) /2 "Manning"                                    | 7,179   |
| (Mike OR Michael) /2 "Morsman"                                    | 11,445  |
| (Mike OR Michael) /2 Sullivan                                     | 12,492  |
| (Steve* OR Steph*) /2 Chipman                                     | 3,525   |
| Alicia /2 Dorset  | 26,661  |
| Jeanine /2 ("O'Kane" OR Okane OR "O Kane")                        | 166,224 |
| Joel /2 "Curran"  | 50,956  |
| Karl* /2 Trimble  | 52,753  |
| Kath* /2 "Wilkinson"  | 2,053   |
| Keith /2 Hughes   | 5,040   |
| Kelly /2 McKenna  | 26,354  |
| Michelle /2 Parisi  | 158     |
| Nancy /2 "Brennan"  | 236,288 |
| Nancy /2 Glick  | 14,735  |
| Neil /2 "Dhillon"   | 43,555  |
| Pete* /2 "Harris"   | 62,388  |
| Pete* /2 Miller   | 229,255 |
| Scott /2 Beaudoin   | 24,075  |
| Stu* /2 "Wilson"  | 12,556  |

## **EXHIBIT B**

**[To be provided by Defendant MSL]**

## **EXHIBIT C**



**Plaintiffs' Updated Preliminary List of Search Terms**

(approve OR approved OR approval OR approving OR reject OR rejected OR rejection OR rejecting)  
w/10 (policy OR policies OR tsokanos OR jim OR miller OR peter OR shapiro OR maury OR dhillon OR  
neil OR curran OR joel OR carberry OR wilson OR renee OR fite OR vicki OR baskin OR rob OR HR OR  
levy OR maurice OR fleurot OR olivier OR etienne OR "jean-michel" OR emmerich OR mathias OR paris  
OR publicis OR corporate OR headquarters OR "new york" OR cafasso OR gross OR bryant OR lillien  
OR lilien OR masini OR morgan OR valerie OR cofone OR tony OR anthony)

(assign OR assigning OR assignment OR assigned) w/10 (policy OR policies OR except OR exception  
OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR  
low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR  
increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity  
OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR  
decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR  
reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias  
OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR  
raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating  
OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR  
transferred OR transferring OR app OR apply OR applied OR applies OR application OR applications OR  
job OR jobs OR position OR positions OR title OR titles OR work OR working OR career OR careers)

(assign OR assigning OR assignment OR assigned) w/10 (hall OR hirson OR mcMahon OR pierce OR  
mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR  
andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR  
lorillo OR moore OR truco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis  
OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowsox OR billups  
OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van home" OR knox OR hugley OR  
glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR  
baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR  
curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass  
OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR  
masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perلمان OR shapiro  
OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR  
dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt  
OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(award OR awards OR awarded OR awarding) w/10 (performance OR merit OR merits OR bonus OR  
bonuses)

(baby OR babies) w/10 (leave OR work OR working OR worklife OR "work-life" OR "work life" OR  
balance)

(balance OR balanced OR balancing) w/10 (career OR job OR work OR life OR worklife OR "work-life"  
OR hour OR hours OR schedule OR reduced OR family)

billable OR billability

bitch OR bitches OR bitchy

(bless OR blessed OR blessing OR blessings) w/10 (tsokanos OR jim OR corp OR corporate OR paris  
OR headquarters OR hq OR publicis)

(bonus OR bonuses) w/10 (policy OR policies OR OR contract OR contractual OR incentive OR "local  
office" OR performance OR discetionary OR except OR exception OR excepted OR fair OR fairness OR  
fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust

OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR reinstate OR reinstated OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

(bonus OR bonuses) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowsox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

bsd

(career OR careers) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

(career OR careers) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowsox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(central OR centralize OR centralized OR centralizing OR centrally) w/10 (management OR manager OR managers OR manage OR managed OR decision OR decisions OR decision-making OR "decision making" OR decision-maker OR "decision maker" OR leader OR leaders OR leadership OR lead OR team OR structure OR executive OR executives)

(chart or charts) w/10 (org OR organization)

(child OR children OR kid OR kids OR daughter OR daughters OR son OR sons OR baby OR babies OR family OR families) w/15 (pay OR paid OR raise OR raised OR raising OR raises OR promote OR promoted OR promoting OR promotion OR promotions OR job OR jobs OR manage OR manager OR MD OR management OR managed OR managing OR salary OR salaries OR bonus OR bonuses OR position OR positions OR career OR careers OR title OR titles OR support OR supported OR supporting OR comp OR comp OR compensate OR compensation OR compensating OR compensated OR because)

"class action"

(commission OR commissions) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

(commission OR commissions) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truoco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillen OR lillian OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(comp OR compensation OR compensated OR compensating) w/10 (policy OR policies OR OR benchmark OR benchmarks OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

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perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

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"conflict shop"

(corporate OR "social media" OR digital OR issues OR "public affairs" OR financial) AND ("new vision" OR reorganization OR reorg OR re-org OR restructure OR restructuring OR structure)

crisis AND (carol OR perlman OR david OR dave OR chamberlin OR tom OR thomas OR vickery OR "new vision" OR reorganization OR reorg OR re-org OR restructure OR restructuring OR structure)

critical w/5 (hire OR hiring OR hired OR hires)

(demote OR demoted OR demotes OR demoting OR demotion OR demotions) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

(demote OR demoted OR demotes OR demoting OR demotion OR demotions) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR



perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(dick OR dicks) NOT ("rick" or "Richard" or "rich")

discriminate OR discriminated OR discriminates OR discrimination OR discriminator OR discriminators

(diversity OR diversification OR diversify) w/10 (gender OR sex OR women OR woman OR parent OR parents OR mother OR mothers OR mom OR moms OR initiative OR initiatives OR effort OR efforts OR policy OR policies OR practice OR practices)

(earn OR earned OR earnings OR earning OR earns) w/10 (except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

(earn OR earned OR earnings OR earning OR earns) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowsox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

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"equal employment"

(eval OR evaluate OR evaluation OR evaluated OR evaluates OR evaluating) w/ 10 (except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR promote OR promoted OR promoting OR promotes OR promotion OR promotions OR demote OR demoted OR demoting OR demotes OR demotion OR demotions)

(eval OR evaluate OR evaluation OR evaluated OR evaluates OR evaluating) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR diffenhafer OR lorillo OR moore OR truocco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannaforde OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mcclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

exception

farrell

(flex OR flexible OR flexibility OR flex-time OR "flex time" OR alternate OR alternative) w/5 (time OR schedule OR schedules OR hour OR hours OR work OR working OR worked OR works OR job OR jobs)

"flight risk" OR "flight-risk"

fmla OR fml

(forecast OR forecasts OR forecasting OR forecasted) w/25 (office OR offices OR practice OR practices OR region OR regions OR regional OR west OR northeast OR midatlantic OR "mid-atlantic" OR midwest OR "mid-west" OR south OR "north america" OR Americas OR restructure OR restructuring OR restructured OR restructures OR reorg OR reorganization OR re-org OR re-organization OR "new vision" OR brand OR brands OR branded OR branding OR network OR team OR teams OR area OR areas OR lead OR leads OR leader OR leaders OR leaderships OR policy OR policies OR except OR exception OR excepted OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR

termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR headcount OR "head-count" OR layoff OR layoff\* OR "lay-off" OR lay-offs OR leave OR plan OR plans OR planning OR planned OR audit OR audits OR auditing OR audited OR budget OR budgets OR budgeting OR budgeted OR rationale OR staff OR staffing OR staffed OR staffs OR personnel OR management OR manager OR managers OR manage OR managed OR decision OR decisions OR decision-making OR "decision making" OR decision-maker OR "decision maker" OR hire OR hires OR hiring OR hired OR retain OR retains OR retained OR retaining OR retention OR promote OR promoting OR promoted OR promotes OR promotion OR promotions OR compensation OR comp OR salary OR salaries OR pay OR paid OR pays OR bonus OR bonuses OR cost OR costs OR severance OR eliminate OR eliminated OR elimination OR eliminating OR elimination)

freeze OR freezes OR freezing OR froze OR frozen

gender

"glass ceiling"

harass OR harassing OR harassment OR harassed OR harasses

headcount OR "head-count" OR (head w/3 count)

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(hire OR hires OR hired OR hiring) w/10 (except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR app OR apply OR applied OR applies OR application OR applications)

(hire OR hires OR hired OR hiring) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillion OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannaforde OR harris OR hughes OR kolhagen OR lee OR lillen OR lillian OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(hr OR "human resources") w/15 (culture OR complain OR complaint OR complaints OR complained OR complains OR complaining OR respond OR response OR responded OR responds OR responding OR investigate OR investigation OR investigating OR investigates OR investigated OR bias OR biases OR biased OR unfair OR unfairly OR unfairness OR fair OR fairly OR fairness OR equity OR equitable OR equal OR treat OR treating OR treated OR treatment OR treats OR pregnant OR pregnancy OR leave)

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(incentive OR incentives) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

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(investigate OR investigation OR investigated OR investigating OR investigates) w/25 (complain OR complaint OR complaints OR complained OR complaining OR complains)

"jean-michel" OR etienne

(job OR jobs) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

(job OR jobs) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannaforde OR harris OR hughes OR kolhagen OR lee OR lillien OR lillian OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)



lawsuit OR "law suit" OR law-suit

layoff OR layoffs OR "lay-off" OR "lay-offs" OR "lay off" OR "lay offs"

(leader OR leaders OR leadership OR lead OR leading OR leads) AND (team OR teams)

"on leave" OR "maternity leave" OR "paternity leave" OR "paid leave" OR "unpaid leave" OR ((take or took) w/5 leave) OR "parental leave" OR (pregnan\* w/5 leave)

leave w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannaforde OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

LTIP

mathias OR emmerich

"mission critical"

"more money" or "less money"

"MS&L Corp- Restructure"

onboard OR "on-board"

(opportunity OR opportunities) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

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da silva OR denker OR dhillion OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(org OR organization) w/10 (new OR change OR changing OR changes OR changed)

"part time" OR "part-time"

(pay OR pays OR paying OR paid) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

(pay OR pays OR paying OR paid) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truoco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR blinkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillion OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(perform OR performed OR performing OR performance OR performs) w/10 (policy OR policies OR rate OR rated OR rates OR rating OR ratings OR review OR reviews OR reviewing OR reviewed OR good OR bad OR high OR low OR excellent OR poor OR improve OR improving OR improvement OR improved OR improves OR stellar OR fair OR fairly OR fairness OR unfair OR unfairly OR unfairness OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusts OR adjustment OR adjusting OR adjustments OR OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

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bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleuret OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(plan OR plans OR planning OR planned OR audit OR audits OR auditing OR audited OR budget OR budgets OR budgeting OR budgeted OR rationale OR staff OR staffing OR staffed OR staffs OR personnel OR salary OR salaries OR promote OR promoted OR promotes OR promoting OR promotion OR promotions OR headcount OR "head-count" OR layoff OR layoff\* OR "lay-off" OR lay-offs OR leave) w/25 (office OR offices OR practice OR practices OR region OR regions OR regional OR west OR northeast OR midatlantic OR "mid-atlantic" OR midwest OR "mid-west" OR south OR "north america" OR Americas OR restructure OR restructuring OR restructured OR restructures OR reorg OR reorganization OR re-org OR re-organization OR "new vision" OR brand OR brands OR branded OR branding OR network OR team OR teams OR area OR areas OR lead OR leads OR leader OR leaders OR leadership)

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(pregnant or pregnancy) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleuret OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

prejudice OR prejudiced OR prejudicial OR prejudices

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(promote OR promoted OR promotes OR promoting OR promotion OR promotions) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR app OR apply OR applied OR applies OR application OR applications)

(promote OR promoted OR promotes OR promoting OR promotion OR promotions) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleuret OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)



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(recommend OR recommended OR recommending OR recommends OR recommendation OR recommendations) w/10 (promote OR promotion OR promotions OR promoted OR promotes OR promoting OR terminate OR termination OR terminations OR terminated OR terminates OR terminating OR fire OR fired OR fires OR firing OR hire OR hired OR hires OR hiring OR pay OR paid OR pays OR paying OR increase OR increasing OR increased OR increases OR raise OR raised OR raises OR raising OR decrease OR decreased OR decreases OR decreasing OR demote OR demotion OR demotions OR demoted OR demotes OR demoting OR transfer OR transfers OR transferred OR transferring)

(recruit OR recruits OR recruited OR recruiting OR recruitment) w/10 (policy OR policies OR lead OR leads OR leader OR leaders OR leadership OR leading OR head OR heads OR heading OR headed OR team OR teams OR north OR america OR americas OR jim OR tsokanos OR md OR mds OR director OR directors OR manage OR manager OR managers OR managed OR manages OR management OR president)

(redefine OR redlined OR redefining OR restructure OR restructured OR restructuring OR move OR moved OR moving OR align OR aligned OR aligning OR alignment) w/15 (lead OR leads OR leader OR leaders OR leadership OR leading OR head OR heads OR heading OR headed OR team OR teams OR north OR america OR americas OR jim OR tsokanos OR region OR regions OR hubs OR west OR Midwest OR northeast OR midatlantic OR south OR md OR mds OR director OR directors OR manage OR manager OR managers OR managed OR manages OR management OR president OR structure)

(reduce OR reduces OR reduced OR reducing OR reduction OR reductions OR eliminate OR eliminates OR eliminated OR eliminating OR elimination OR eliminations) w/5 (policy OR policies OR force OR work OR work-force OR workforce OR job OR jobs OR position OR positions OR title OR titles OR team OR teams OR practice OR practices OR staff OR headcount OR employee OR employees OR cost OR costs OR saving OR savings)

(reduce OR reduces OR reduced OR reducing OR reduction OR reductions OR eliminate OR eliminates OR eliminated OR eliminating OR elimination OR eliminations) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(region OR regions OR regional OR hub OR hubs) w/10 (lead OR leads OR leader OR leaders OR leadership OR leading OR head OR heads OR heading OR headed OR team OR teams OR north OR america OR americas OR jim OR tsokanos OR md OR mds OR director OR directors OR manage OR manager OR managers OR managed OR manages OR management OR president)

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(resign OR resigns OR resigned OR resigning OR resignation OR resignations) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

(resign OR resigns OR resigned OR resigning OR resignation OR resignations) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truoco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillion OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

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(salary OR salaries) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truoco OR

lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

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(survey OR suveys OR surveyed OR surveying OR questionnaire OR questionnaires OR interview OR interviews OR comment OR comments OR feedback) w/10 (salary OR salaries OR band OR bands OR bench OR benchmark OR benchmarks OR bench-mark OR bench-marks OR promotion OR promotions OR leadership OR management OR executives OR "glass ceiling" OR women OR females OR pregnancy OR worklife OR "working mothers" OR caregivers OR family OR gender OR sex)

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(terminate OR terminated OR terminates OR terminating OR termination OR terminations) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR cost OR costs OR saving OR savings)

(terminate OR terminated OR terminates OR terminating OR termination OR terminations) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truocco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(title OR titles) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)

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"title vii" or "title 7"

(train OR trained OR trains OR training) w/10 (policy OR policies OR manage OR manages OR manager OR managers OR managed OR management OR managing OR leader OR leaders OR leadership OR lead OR leads OR leading)

(transfer OR transfers OR transferred OR transferring) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating)

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dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

uniform

"Viva la Difference"

(wage OR wages) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)

(wage OR wages) w/10 (hall OR hirson OR mcmahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR da silva OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)

(work OR works OR working OR worked) w/5 (home OR house OR apartment OR apt)

"working capital" w/10 action OR plan OR component OR improve OR improved OR improvement OR raises OR bonuses OR promoions

**EXHIBIT D**

| Metadata Field   | Description   |
|------------------|---|
| BegBates         | Beginning production number   |
| EndBates         | Ending production number  |
| BegAttach        | Beginning production number for document family                                   |
| EndAttach        | Ending production number for document family                                      |
| Custodian        | Name of the person from whose files the document is being produced                |
| DocType          | Type of file (e.g. Email, Attachment, Efile)                                      |
| FileType         | Application used to create the file (e.g. Microsoft Word, Adobe Acrobat)          |
| FileExt          | File Extension (e.g. .MSG, .DOC, .XLS)  |
| FileSize         | File size of the document in Bytes  |
| UNID             | Lotus Notes universal document identifier   |
| EmailType        | Indication of type of email item (e.g. Calendar, Contact, Email, Note)            |
| Author           | 'From' field of an email  |
| Recipient        | 'To' field of an email  |
| CC               | 'CC' field of an email  |
| BCC              | 'BCC' field of an email   |
| Subject          | 'Subject' field of an email   |
| DateSent         | Date the email was sent   |
| TimeSent         | Time the email was sent   |
| DateReceived     | Date the email was received   |
| TimeReceived     | Time the email was received   |
| Redacted         | Indication that the document being produced is redacted                           |
| MD5Hash          | MD5 Hash value of the document  |
| FileName         | Filename of attachment or loose Efile   |
| FilePath         | Path to the folder where the loose file was maintained                            |
| FileTitle        | 'Title' field embedded in extended properties of attachment or loose Efile        |
| FileAuthor       | 'Author' field embedded in extended properties of attachment or loose Efile       |
| FileCompany      | 'Company' field embedded in extended properties of attachment or loose Efile      |
| FileComments     | 'Comments' field embedded in extended properties of attachment or loose Efile     |
| FileCreationDate | 'DateCreated' field embedded in extended properties of attachment or loose Efile  |
| FileDatePrinted  | 'Last Printed' field embedded in extended properties of attachment or loose Efile |
| DateCreated      | File system Date Created field  |
| DateModified     | File system Date Modified field   |
| NativeLinkPath   | Path to the native files produced in the delivery                                 |
| NativeLinkName   | Name of native file produced in the delivery                                      |
| ImageLinkPath    | Path to the redacted image files produced in the delivery                         |
| ImageLinkName    | Name of redacted image file produced in the delivery                              |
| TextPath         | Path to the text files containing the extracted text produced in the delivery     |
| TextName         | Name of text file produced in the delivery  |